

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

ROOT, INC., et al., :
: Case No. 2:23-cv-512
Plaintiffs, : Judge Sarah D. Morrison
vs. : Magistrate Judge Elizabeth A.
: Preston Deavers
BRINSON CALEB SILVER, et al., :
: Defendants. :
:

**RECEIVER'S FOURTH INTERIM REPORT, RECEIVERSHIP PLAN
AND APPLICATION FOR FEES AND EXPENSES OF RECEIVER AND
COUNSEL TO RECEIVER COVERING THE PERIOD
SEPTEMBER 1, 2023 THROUGH SEPTEMBER 30, 2023**

In accordance with the requirements of this Court's *Order*, filed May 12, 2023 [Doc. # 99], *Order Appointing Receiver*, filed May 17, 2023 [Doc. # 101], and *Order Amending Order Appointing Receiver*, filed June 7, 2023 [Doc. # 120] (hereinafter collectively "Receiver Order"), Jerry E. Peer, Jr. ("Receiver"), has taken possession and/or control of all monetary and real property assets of Mr. Brinson Caleb Silver, Collateral Damage, LLC and Eclipse Home Design, LLC (hereinafter collectively "Defendants") known to Receiver, unless otherwise indicated herein. Pursuant to the Receiver Order and 28 U.S.C. §§ 754, 959 and 1692, Rule 66 of the Federal Rules of Civil Procedure, Receiver has completed this Fourth Interim Report and Receivership Plan and accompanying schedules ("Fourth Report"), which covers the period from September 1, 2023 through and including September 30, 2023 (the "Fourth Interim Period").

I. INTRODUCTION

By way of the Receiver Order, Receiver was appointed to assume complete control and oversight all monetary and real property assets of Defendants. Since the filing of the Third Report, Receiver has continued his efforts to identify and take possession of all monetary and real property

assets of Defendants. At this time, Receiver is unaware of any assets of Defendants that are not in Receiver's possession or under his control, with the exception of a bank account located in Jakarta, Indonesia, and another at Evolve Bank and Trust, which are addressed further below.

During the Fourth Period, Receiver and his counsel have focused primarily on developing a comprehensive liquidation plan for the assets in Receiver's possession or under his control and executing on that plan. Receiver has engaged an auction firm for the sale of the Ramona California home and anticipates having the auction completed within the next 30 days. In addition, Receiver is currently negotiating, and expects to be submitting for approval, a listing agreement with a Miami, Florida realtor, Marco Tine, who specializes in properties the same or similar to the Bayshore property. Receiver has also requested and has now obtained a quote from KabCo Kitchens for the restoration of the Bayshore property. In the coming weeks, Receiver anticipates filing a motion to recommend performing the work necessary for the renovation at the Bayshore property. The third property, located in Venice, California, is expected to be offered for sale by and through an auction listing similar to the Ramona California home. In the coming weeks, Receiver will be filing a motion to engage an auctioneer for the sale of the Venice property.

As mentioned in the Third Report, Receiver has taken possession of a 2018 Range Rover and has now taken possession of the 2017 Mercedes GLE350, which is owned by Mr. Silver and was driven by Ms. Laurie Mannette. Preliminary research indicates that both vehicles are valued from \$27,000 – \$35,000. Receiver has requested that Gryphon Realty advertise the vehicles for sale through the Ramona auction advertising. Should an acceptable offer be made for either or both vehicles, a motion to sell will be submitted to this Court for approval. Should an acceptable offer not be made, Receiver will consider alternative means of liquidating the vehicles, such as a local automobile auction.

Receiver has been in communication with the owner of 8331 Bleriot, Los Angeles,

California, which was previously leased by Mr. Silver. Located therein is the personal property of Mr. Silver. Receiver and his counsel have inspected the property and do not currently believe the personal property to be of significant value as confirmed by several professionals who have reviewed the personal property items. As such, Receiver has determined that such items have no value and that it is in the best interest of the estate to abandon the same. In the coming weeks, Receiver will file an appropriate motion with the Court.

On September 15, 2023, this Court approved Receiver's Motion To Sell Plane Dock at Private Sale Free and Clear Of Any And All Interests, Liens, Claims and Encumbrances. This transaction is now complete, however the receivership estate has yet to receive the funds from the sale as detailed below.

As mentioned above, at this time, the only known asset not currently in the possession or control of Receiver is the bank account located in Jakarta, Indonesia and another at Evolve Bank and Trust. Mr. Silver has represented that the funds in these accounts have been exhausted, however, Receiver believes there may be significant funds deposited into these accounts and has requested that Defendants provide the information necessary to take control of the balance of that account, or to confirm that these accounts have indeed been exhausted. In addition, Receiver has recently taken possession of Mr. Silver's laptop computer and mobile phone. Receiver has engaged an IT professional to create an image of each device and review the information to assist with the collection of assets and/or information useful to Receiver.

II. RECEIVERSHIP PLAN

This Fourth Report will set forth (1) Receiver's intentions moving forward with regard to both identifying and taking control of assets as well as liquidating assets of value; (2) a statement of assets in Receiver's possession or under his control; (3) anticipated transactional costs to be incurred; (4) anticipated duration of the administration of this estate; (5) engagement of

professionals to carry out Receiver's responsibilities; (6) estimated date by which an appraisal and sale by Receiver can occur and whether it will be public and/or private sales of the real property; and (7) any litigation or administrative proceedings that are underway or anticipated.

1. Receiver's Goal/Expectations For Administration.

During the Fourth Interim Period, Receiver and his counsel have devoted efforts to formulating a liquidation plan for the assets in Receiver's possession or under his control. As mentioned prior, Receiver is moving forward with the sale of the Ramona California property and expects to be listing the Venice property within the next 30 days. As for the Bayshore property, Receiver has determined that listing the property for immediate sale, along with moving forward with renovations is in the best interest of the estate. In the coming weeks, Receiver anticipates filing a motion recommending performing the work necessary for the renovation at the Bayshore property and engaging a local realtor for the listing of this property.

2. Statement of Assets.

At this time, Receiver has not identified any new assets of the estate that have not been previously reported to this Court and the parties. As of September 30, 2023 Receiver currently has \$433,932.88 on deposit. A copy of Receiver's account register reflecting that amount, as well as the September 2023 Huntington National Bank statement are attached hereto as "**Exhibit A.**"

3. Anticipated Transactional Costs and Administrative Expenses.

It is difficult for Receiver to project the anticipated transactional and administrative costs of this estate. While certain expenses are customary and expected, such as administrative fees, utilities, insurance, and other related operating expenses, costs are highly variable and may fluctuate greatly. Receiver expects to incur certain fees, commissions, and expenses associated with the liquidation of the assets and further administration of the estate. The anticipated costs will also depend greatly on success in taking control of the real estate and liquidating the assets in

a cost-efficient manner. Receiver further requests an allowance of \$2,500 per month for related ongoing administrative expenses.

4. Duration of this Receivership.

Based upon this plan and Receiver's initial research, it is estimated that the duration of this receivership estate is six (6) months or longer. This estimated duration is largely dependent upon the success of Receiver to identify and take possession of additional assets, negotiating a proposed sale of the respective assets, and the approval of any such sale by this Court.

5. Engagement of Professionals.

Receiver has engaged in negotiations with property managers in both Florida and California to assist with securing and maintaining the respective properties until sold. In addition, subject to this Court's approval, Receiver has engaged legal counsel in each state to address pending litigation as well as bringing actions for eviction, if necessary. Lastly, Receiver has and expects to engage appraisers, real estate brokers and/or auctioneers to assist with selling the properties. Any such engagement(s) will be subject to this Court's prior approval.

6. Estimated Date of Appraisal and Sale.

In an effort to reduce costs and for the time being, Receiver is presently relying on valuation information previously provided by Plaintiff and value estimates provided by real estate brokers and managers. Should Receiver determine at a later date that an appraisal or other valuation is necessary for the properties, Receiver will immediately obtain such appraisal and provide same to the Court and parties. Receiver is not including valuation information in this Fourth Interim Report in an effort not to publicly disclose same to any potentially interested buyers. Receiver will provide all information in its possession to the Court or any party upon request.

Notwithstanding the above, due to the nature of Defendants' business, it is difficult for

Receiver to estimate at this time how long it may take to receive an offer for the real estate and any other assets not sold at public sale.

7. **Litigation and Administrative Proceedings.**

Receiver reports that at this time he is only aware of a pending foreclosure action filed in Dade County, Florida against the Bayshore Drive property. That case has now been stayed. Receiver has also learned of the eviction action discussed above and has contacted counsel for the Plaintiff to come to an agreement that provides the Plaintiff with the possession of the property while also securing the personal property located therein. Should any additional proceedings be initiated or discovered, Receiver will immediately file a Suggestion of Stay, pursuant to the terms of this Court's Receiver Order.

III. CLAIMS

Receiver has identified various creditors/claimants of Defendants. Receiver has provided notice of the receivership to all known creditors/claimants of Defendants for which Receiver has valid addresses. As claims are received, a creditor matrix will be provided with subsequent interim reports, identifying the claimant and amount of each claim. Receiver notes for the Court no independent analysis or review of the validity or allowance of such claims will be undertaken by Receiver until assets of the receivership estates are sold, at which time any claims will be reviewed and a recommendation as to the treatment of those claims will be submitted by Receiver.

IV. FEES AND EXPENSES

1. Receiver Fees and Expenses.

As required by the Receiver Order, Receiver is making application to the Court for interim allowance of compensation and reimbursement of out-of-pocket expenses. Please note that while Mr. Jerry E. Peer, Jr. was appointed as Receiver, due to the volume of work necessary, both Mr. Gregory S. Peterson and Mr. Istvan Gajary have performed certain services and billed that time at

the Receiver rate of \$150 per hour rather than the counsel rate of \$250 per hour to assist with controlling the costs of administration. A detailed summary of activity for Receiver is attached hereto as “**Exhibit B**”. Receiver requests allowance and payment of interim compensation and expenses in the amount of \$1,845.00 to compensate Receiver for the hours expended and expenses incurred during the Fourth Interim Period.

2. Peterson Conners LLP Fees and Expenses.

Pursuant to the Receiver Order, Receiver employed the services of Mr. Peer, Mr. Peterson, and Mr. Gajary of Peterson Conners LLP (collectively “PetersonConners”) as its legal counsel. Receiver requests interim allowance and payment of compensation to PetersonConners in the amount of \$12,937.50 for services rendered to Receiver and \$133.11 for expenses incurred during the Fourth Interim Period. Attached hereto as “**Exhibit C**” is the itemization setting forth the breakdown of time expended and costs advanced by PetersonConners during the Fourth Interim Period.

V. CONCLUSION

Receiver respectfully submits this Fourth Report and further respectfully requests that this Fourth Report and Receiver’s Fourth Interim Application for Allowance and Payment of Fees and Reimbursement of Expenses be approved.

Respectfully submitted,

PETERSON CONNERS LLP

/s/ Istvan Gajary

GREGORY S. PETERSON (0061915)

JERRY E. PEER, JR. (0075128)

ISTVAN GAJARY (0089084)

545 Metro Place South, Suite 435

Dublin, Ohio 43017

Telephone: (614) 365-7000

Facsimile: (614) 220-0197

E-mail: gpeterson@petersonconners.com

jpeer@petersonconners.com
igajary@petersonconners.com
Counsel for Receiver, Jerry E. Peer, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically on this 20th day of October, 2023 with the Clerk of Court using the CM/ECF system. Service will be made through the Court's CM/ECF system on all parties and attorneys so registered, and all parties may access this filing through the Court's system.

A copy was also sent by regular U.S.P.S. mail and by electronic mail to the following:

Collateral Damage, LLC
101 N. Brand Blvd.
11th Floor
Glendale, CA 91203

Eclipse Home Design, LLC
651 N. Broad Street
Suite 201
Middletown, DE 19709

Paige McDaniel
5576 Alexanders Lake Road
Stockbridge, GA 30281

Brinson Caleb Silver
2543 Walnut Ave.
Venice CA 90291

/s/ Istvan Gajary
ISTVAN GAJARY (0089084)

Exhibit A

Huntington National Bank

Peterson
Conners LLP
ATTORNEYS AND
COUNSELORS AT LAW

Type	Date	Description of transaction	Cleared Y/N	Debit (-)	Credit (+)	Balance
wire	5/23/23	13105 Biscayne closing proceeds	Y		\$570,811.34	\$570,811.34
	5/31/23	Interest	Y		\$0.93	\$570,812.27
fee	6/15/23	Incoming Wire Fee	Y	\$18.00		\$570,794.27
fee	6/15/23	monthly fee, waived	Y	\$40.00	\$40.00	\$570,794.27
	6/30/23	Interest	Y		\$14.08	\$570,808.35
1001	7/11/23	Peterson Conners LLP	Y	\$77,574.02		\$493,234.33
1002	7/20/23	Kristin Hess, AC reimb.	Y	\$2,788.00		\$490,446.33
dep	7/24/23	Shellpoint funds	Y		\$16,513.89	\$506,960.22
1003	7/27/23	Calif. Auto. Ins. Co., 2543 Walnut Ave prem.	Y	\$1,260.15		\$505,700.07
	7/31/23	Interest	Y		\$13.28	\$505,713.35
1004	8/3/23	*void check*	-	\$0.00	\$0.00	\$505,713.35
1005	8/3/23	Daniel's Landscaping, 19803 Vista Del Otero	Y	\$2,250.00		\$503,463.35
1006	8/15/23	Peterson Conners LLP	Y	\$67,427.31		\$436,036.04
dep	8/29/23	Wave Runner sale proceeds	Y		\$10,000.00	\$446,036.04
	8/31/23	interest	Y		\$11.95	\$446,047.99
wire	9/20/23	Gryphon USA, Ltd. Ramona marketing advance	Y	\$12,126.00		\$433,921.99
	9/29/23	interest	Y		\$10.89	\$433,932.88
1007	10/3/23	Peterson Conners LLP	Y	\$28,731.22		\$405,201.66
1008	10/3/23	Hunt Ortman Palfy Nieves Inv. 102103	Y	\$901.87		\$404,299.79
1009	10/3/23	Dickinson Wright PLLC Inv. 1846072	Y	\$17,419.31		\$386,880.48
fees	10/16/23	wire and service fees partially waived	Y	\$90.00	\$40.00	\$386,830.48
1010	10/17/2023	Daniel's Landscaping, 19803 Vista Del Otero		\$1,175.00		\$385,655.48

THE HUNTINGTON NATIONAL BANK
PO BOX 1558 EA1W37
COLUMBUS OH 43216-1558



PETERSON CONNERS LLP
545 METRO PL S
DUBLIN OH 43017-5316

Have a Question or Concern?

Stop by your nearest
Huntington office or
contact us at:

1-800-480-2001

[www.huntington.com/
businessresources](http://www.huntington.com/businessresources)

Huntington Unlimited Plus Checking

Account: -----4754

Statement Activity From: 09/01/23 to 09/30/23		Beginning Balance	\$446,047.99
Days in Statement Period	30	Credits (+) Interest Earned	10.89 10.89
Average Ledger Balance*	441,601.79	Debits (-) Wire Transfer Debits	12,126.00 12,126.00
Average Collected Balance*	441,601.79	Total Service Charges (-)	0.00
* The above balances correspond to the service charge cycle for this account.		Ending Balance	\$433,932.88

Average Percentage Yield Earned this period 0.030%

Other Credits (+)

Account: -----4754

Date	Amount	Description
09/29	10.89	INTEREST PAYMENT

Other Debits (-)

Account: -----4754

Date	Amount	Description
09/20	12,126.00	OUTGOING FEDWIRE TRANSFER - MANUAL

Service Charge Summary

Account: -----4754

Previous Month Service Charges (-)	\$0.00
Total Service Charges (-)	\$0.00

Balance Activity

Account: -----4754

Date	Balance	Date	Balance	Date	Balance
08/31	446,047.99	09/20	433,921.99	09/29	433,932.88

Investments are offered through the Huntington Investment Company, Registered Investment Advisor, member FINRA/SIPC, a wholly-owned subsidiary of Huntington Bancshares Inc.

The Huntington National Bank is Member FDIC.  [®], Huntington [®] and 24-Hour Grace [®] are federally registered service marks of Huntington Bancshares Incorporated. The 24-Hour Grace [®] system and method is patented: US Pat. No. 8,364,581, 8,781,955, 10,475,118, and others pending. [®]2023 Huntington Bancshares Incorporated.



In the Event of Errors or Questions Concerning Electronic Fund Transfers (electronic deposits, withdrawals, transfers, payments, or purchases), please call either 1-614-480-2001 or call toll free 1-800-480-2001, or write to The Huntington National Bank Research - EA4W61, P.O. Box 1558, Columbus, Ohio 43216 as soon as you can, if you think your statement or receipt is wrong or if you need more information about an electronic fund transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

1. Tell us your name, your business's name (if appropriate) and the Huntington account number (if any).
2. Describe the error or the transaction you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
3. Tell us the dollar amount of the suspected error. We will investigate your complaint or question and will correct any error promptly.

Verification of Electronic Deposits If you authorized someone to make regular electronic fund transfers of money to your account at least once every sixty days, you can find out whether or not the deposit has been received by us, call either 1-614-480-2001 or call toll free 1-800-480-2001.

Balancing Your Statement - For your convenience, a balancing page is available on our web site <https://www.huntington.com/pdf/balancing.pdf> and also available on Huntington Business Online.

Exhibit B**Peterson Conners LLP****INVOICE**

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7330
 Date: 10/20/2023

United States Southern District

Receiver / Root, et al. v. Silver, et al., 2:23cv512

Date	Notes	Timekeeper	Quantity	Rate	Total
09/01/2023	Attention to emails from A Sorokurs.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
09/05/2023	Attention to maintenance items and electric issues at Bayshore property.	Istvan Gajary	1.50	\$150.00	\$225.00
09/05/2023	Attention to several emails re: Bayshore and Bleriot properties.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
09/06/2023	Follow up on quotes needed from KabCo Kitchens for remodel of Bayshore property.	Istvan Gajary	0.50	\$150.00	\$75.00
09/07/2023	Attention to numerous emails and telephone call with property manager, Julie, and Carlos (KabCo Kitchens) and various others regarding details at Bayshore property.	Istvan Gajary	2.50	\$150.00	\$375.00
09/07/2023	Attention to emails re: value of personal property and contractor work at Bayshore.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
09/08/2023	Following up on obtaining valuer of personal property.	Jerry E. Peer, Jr.	0.70	\$150.00	\$105.00
09/13/2023	Attention to email and text from Y Devico re: Miami property and foreclosure action.	Jerry E. Peer, Jr.	0.20	\$150.00	\$30.00
09/14/2023	Attention to emails re: Florida litigation. Phone call with counsel re: same. Review of Ramona auction agreements. Attention to motion to sell plane dock.	Jerry E. Peer, Jr.	2.20	\$150.00	\$330.00
09/15/2023	Attention to several emails re: personal property value, wave runner, and subpoenas.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
09/19/2023	Attention to letter from counsel to Bayshore mortgagee. Attention to emails re: same.	Jerry E. Peer, Jr.	0.40	\$150.00	\$60.00

09/20/2023	Phone calls with R Kruse re: listing/auction terms and engagement of California realtor.	Jerry E. Peer, Jr.	0.60	\$150.00	\$90.00
09/21/2023	Attention to estimates from KabCo Kitchens.	Jerry E. Peer, Jr.	0.80	\$150.00	\$120.00
09/27/2023	Attention to plan for liquidation of real estate and vehicles. Email to L Mannette re: same.	Jerry E. Peer, Jr.	0.50	\$150.00	\$75.00
09/29/2023	Telephone call with California realtor Tyler about listing details at Walnut St. property.	Istvan Gajary	0.40	\$150.00	\$60.00
					Subtotal \$1,845.00
					Total \$1,845.00

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00	+ \$1,845.00) - (\$0.00) = \$1,845.00

Please make all amounts payable to: Peterson Conners LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097

Exhibit C**Peterson Conners LLP****INVOICE**

545 Metro Place South, Suite 435
 Dublin, OH 43017
 United States
 (614) 365-7000

Invoice # 7331
 Date: 10/20/2023

United States Southern District

Attorney / Root, et al. v. Silver, et al., 2:23cv512**Services**

Date	Notes	Timekeeper	Quantity	Rate	Total
09/01/2023	Attention to numerous emails and texts about receivership tasks.	Istvan Gajary	0.70	\$250.00	\$175.00
09/06/2023	Review of motion to sell plane dock. Attention to emails from counsel re: amending complaint.	Jerry E. Peer, Jr.	0.50	\$250.00	\$125.00
09/07/2023	Assistance with motion to sell Plane Dock.	Catherine J. Schwartz	0.60	\$125.00	\$75.00
09/08/2023	Reconcile the August account statement from Huntington National Bank; assist in gathering exhibits for the Third Interim Report and transmit to Jerry Peer; multiple emails regarding the same.	Catherine J. Schwartz	0.40	\$125.00	\$50.00
09/11/2023	Review of Seller Disclosures re: Ramona sale. Phone call with R Kruse re: same. Drafting Third Report.	Jerry E. Peer, Jr.	3.60	\$250.00	\$900.00
09/11/2023	Attention to emails about granting of motion for appointment of auctioneer; forward same to Rich and Tyler.	Istvan Gajary	0.40	\$250.00	\$100.00
09/12/2023	Attention to Motion to Enforce Stay. Email to counsel re: same. Review of motion and second amended complaint.	Jerry E. Peer, Jr.	1.00	\$250.00	\$250.00
09/12/2023	Phone call with R Kruse re: terms of listing agreement with CA brokerage.	Jerry E. Peer, Jr.	0.50	\$250.00	\$125.00
09/12/2023	Reviewing and revising listing agreement.	Jerry E. Peer, Jr.	0.80	\$250.00	\$200.00

09/13/2023	Attention to listing agreement and related documents.	Jerry E. Peer, Jr.	0.60	\$250.00	\$150.00
09/13/2023	Attention to numerous emails with Florida local counsel regarding amended motion to enforce stay; locate and deliver notice of filing of receivership in Southern District of Florida.	Istvan Gajary	2.30	\$250.00	\$575.00
09/13/2023	Review listing agreement, documents related to real estate sales.	Gregory Peterson	1.10	\$250.00	\$275.00
09/13/2023	Attention to emails re: stay of Bayshore foreclosure and listing documents for Ramona.	Jerry E. Peer, Jr.	0.70	\$250.00	\$175.00
09/14/2023	Attention to return of \$186.46 by the Florida Power & Light Company, funds related to September 2022 and N. Bayshore Drive.	Catherine J. Schwartz	0.30	\$125.00	\$37.50
09/14/2023	Conference call with counsel for Florida lender.	Gregory Peterson	0.60	\$250.00	\$150.00
09/14/2023	Prepare proposed order for sale of plane dock; review file and telephone call with Yonel of Miami 555, LLC to discuss resolution of Bayshore Property; review affidavit of indebtedness; attention to related emails.	Istvan Gajary	3.30	\$250.00	\$825.00
09/15/2023	Emails about the Fidelity account papers and July subpoena.	Catherine J. Schwartz	0.20	\$125.00	\$25.00
09/15/2023	Revise, finish, and deliver proposed order on pland dock sale to Court; review facts related to email and telephone call offer of resolution from Yonel of Miami 555, LLC; attention to numerous other emails related to numerous other receivership items.	Istvan Gajary	3.80	\$250.00	\$950.00
09/15/2023	Follow up emails concerning Fidelity subpoena response and production of documentation.	Gregory Peterson	2.10	\$250.00	\$525.00
09/18/2023	Attention to M Tine listing agreement. Attention to emails from R Kruse re: Ramona auction.	Jerry E. Peer, Jr.	0.50	\$250.00	\$125.00
09/19/2023	Attention to emails re: settlement offer re: Bayshore property. Review of brief's related to stay. Attention to emails re: transfer of Wave Runner. Review of California realtor/broker agreements and disclosures. Phone call with R Kruse re: same. Drafting Amended Order to Sell Wave Runner.	Jerry E. Peer, Jr.	2.50	\$250.00	\$625.00

09/19/2023	Multiple email communications with Mr. Rich Kruse and Atty. Peer regarding the Ramona property; attention to emails about unresolved wave runner issues.	Catherine J. Schwartz	0.20	\$125.00	\$25.00
09/19/2023	Attention to numerous emails with Florida local counsel; review proposed letter to counsel for 555 Miami, LLC regarding Bayshore property stay; review other receivership matters.	Istvan Gajary	2.50	\$250.00	\$625.00
09/19/2023	Attention to emails with Carlos and Tyler about Bayshore, Ramona, and Walnut properties. Review Third Interim Report; estimates for renovation work. Texts and emails with co-counsel.	Gregory Peterson	2.50	\$250.00	\$625.00
09/20/2023	Review of Bayshore listing agreement. Email to M Tine re: same. Drafting Third Interim Report. Attention to email from I Gajary re: various updates. Quick review of Kabco estimates.	Jerry E. Peer, Jr.	2.50	\$250.00	\$625.00
09/20/2023	Attention to numerous calls and emails with Carlos and Tyler about Bayshore, Ramona, and Walnut properties; review and revise Third Interim Report; review numerous estimates for renovation work at Bayshore; attention to numerous texts and emails with co-counsel regarding same; update email summarizing numerous receivership items.	Istvan Gajary	5.80	\$250.00	\$1,450.00
09/21/2023	Drafting engagement letter for CBG. Review of revised Listing Agreement for Bayshore. Revising Third Interim Report.	Jerry E. Peer, Jr.	0.90	\$250.00	\$225.00
09/21/2023	Assist with preparation of the Third Interim Report. Emails with R Kruse about the notation order approving the Motion for Auctioneer [Doc. 162].	Catherine J. Schwartz	0.80	\$125.00	\$100.00
09/21/2023	Revise and file Third Interim Report; review and attach related exhibits; review quotes from KabCo Kitchens on additional work required at Bayshore; attention to details related to Ramona property.	Istvan Gajary	3.50	\$250.00	\$875.00
09/25/2023	Review emails from KabCo Kitchens and updated interior quote for work at Bayshore property; pay electric bill and establish electric account with FPL.	Istvan Gajary	2.40	\$250.00	\$600.00
09/25/2023	Address issues regarding renovations estimates and other matters regarding Bayshore renovations.	Gregory Peterson	1.10	\$250.00	\$275.00
09/25/2023	Digest additional financial information	Gregory Peterson	0.80	\$250.00	\$200.00

being produced via subpoenas.					
09/26/2023	Review emails and follow-up with ICON Aircraft on the Plane Dock sale.	Catherine J. Schwartz	0.20	\$125.00	\$25.00
09/26/2023	Continued review of cost estimate for renovation of Bayshore property; review file and begin drafting motion to expend receivership funds to renovate Bayshore.	Istvan Gajary	2.30	\$250.00	\$575.00
09/28/2023	Attention to numerous emails related to auction listing for Ramona property.	Istvan Gajary	0.70	\$250.00	\$175.00
09/29/2023	Attention to emails and file documents, including those related to the auction of the Ramona property, KabCo Kitchens' updated interior quote for the Bayshore property. Review the filed Third Interim Report and HNB records.	Catherine J. Schwartz	0.80	\$125.00	\$100.00
				Services Subtotal	\$12,937.50

Expenses

Date	Notes	Quantity	Rate	Total
09/25/2023	Florida Power and Light utility payment, Bayshore Drive.	1.00	\$133.11	\$133.11
				Expenses Subtotal
				\$133.11
				Subtotal
				\$13,070.61
				Total
				\$13,070.61

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00	+ \$13,070.61) - (\$0.00) = \$13,070.61

Please make all amounts payable to: Peterson Conners LLP

Payment is due upon receipt.

Payments more than 30 days overdue incur 1.5% per month interest charges.

Please notify us if your contact information has changed.

Our Tax ID: 20-8129097